



September 25, 2023

Via CM/ECF

Honorable Therese Wiley Dancks
U.S. District Court for the Northern District of New York
100 South Clinton Street
PO Box 7346
Syracuse, NY 13261

Re: Vengalattore v. Cornell University, No. 3:18-cv-01124-GLS-TWD

Dear Magistrate Judge Dancks:

We represent Plaintiff Mukund Vengalattore. We write on behalf of both parties to request an extension of the discovery deadline and the deadline for dispositive motions.

The parties have proceeded diligently through discovery. Written discovery is largely complete. Defendant will be responding to several supplemental interrogatories in the very near future. Depositions of the parties and two other witnesses were conducted over the summer. The depositions of two additional witnesses are scheduled for later this week.

While we have made significant progress in discovery, the parties request an extension to enable us to complete the scheduled depositions, file responses to pending interrogatories, review deposition transcripts, and complete any supplemental discovery that is required based on the witness testimony.

Accordingly, we request that the discovery deadline be extended up to and including November 16, 2023. We further request that the deadline to file dispositive motions be extended up to and including January 4, 2023.

If this meets with the Court's approval, please "so order."

Respectfully submitted,

/s/ Richard A. Samp

Richard A. Samp
New Civil Liberties Alliance
1225 19th St. NW, Suite 450
Washington, DC 20036
rich.samp@ncla.legal
(202) 869-5210
Counsel for Plaintiff Mukund Vengalattore

cc: Counsel of Record (via ECF)